

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
NATIONAL HOCKEY LEAGUE, :
:
Plaintiff, :
:
v. : 1:16 CV 04287 (AJN)
:
NATIONAL HOCKEY LEAGUE :
PLAYERS' ASSOCIATION, :
:
Defendant. :
----- X

**NOTICE OF MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO CONFIRM
ARBITRATION AWARD**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated July 29, 2016, the National Hockey League Players' Association ("NHLPA"), by and through the undersigned counsel of record, will move this Court, before the Honorable Alison Nathan, United States District Judge, United States District Court for the Southern District of New York, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) and section 301 of the Labor Management Relations Act, dismissing the Complaint of the National Hockey League ("NHL") or, in the alternative, granting the motion to confirm the March 10, 2016 Award of Neutral Discipline Arbitrator, James Oldham ("Award"), which is attached to the NHL Complaint as Exhibit D, and for such other and further relief as this Court may deem just and proper.

The grounds for this motion are fully set forth in the accompanying Memorandum of Law.

Dated: July 29, 2016

Respectfully submitted,

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